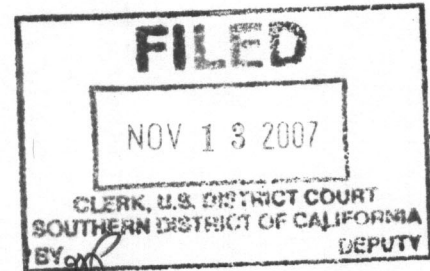


ORIGINAL



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAVINDERJIT SINGH SEKHON

Defendant.

Criminal Case No. *07 CR 2918H*

S U P E R C E D I N G  
I N F O R M A T I O N

Title 18, U.S.C. Sec. 1343  
Wire Fraud;  
Title 18, U.S.C. Sec. 2  
Aiding and Abetting

The United States Attorney charges:

INTRODUCTORY ALLEGATIONS

At all times relevant to this Information:

1. Alejandro Lopez (A. Lopez) charged elsewhere, and his brother, Emilio Lopez (E. Lopez) charged elsewhere, headed, managed, and supervised the "Lopez Team," which consisted of, among others, real estate agents and loan officers who conducted real estate and loan broker activities, including Defendant Ravinderjit Singh Sekhon (Defendant Sekhon) and Linda Velasquez (Velasquez) charged elsewhere.

1 After in or about November 2004, the Lopez Team worked at the Century  
2 21 ElDorado office (ElDorado), in San Marcos, California. The co-  
3 owners of ElDorado were A. Lopez, E. Lopez, and the two principals  
4 of Century 21 Homes First.

5 2. In addition to acting as real estate agents, the Lopez Team  
6 originated and brokered mortgage loans for its clients, obtaining  
7 funding from several sub-prime mortgage lenders. The sub-prime  
8 lenders offered "stated income" or "no income verification" loans at  
9 higher interest rates than conventional loans.

10 3. Defendant Sekhon, who was A. Lopez's brother-in-law, was  
11 hired by A. Lopez and E. Lopez as a loan officer. Defendant Sekhon  
12 helped complete loan applications and assembled loan documentation  
13 for Lopez Team clients who sought from the sub-prime lenders  
14 financing for home purchases and loan refinances.

15 4. Velasquez, who was hired by A. Lopez and E. Lopez,  
16 scheduled appointments, met with Lopez Team clients, discussed with  
17 clients their payment options and the use of straw buyers (i.e.,  
18 third parties to fraudulently act as home buyers and borrowers), and  
19 acted as a Spanish language translator for Defendant Sekhon.  
20 Defendant Velasquez entered into a database the clients' personal and  
21 financial information which Velasquez and other Lopez Team members  
22 obtained verbally and from information forms they had the clients  
23 complete.

24 5. The Lopez Team could access the password-protected database  
25 on the Lopez Team website, which resided on a computer server in  
26 Florida. Defendant Sekhon, A. Lopez, Velasquez, and other Lopez team  
27 members used the database to monitor the status of its clients' real  
28 estate and loan transactions. Velasquez often printed client



1 information from the database and provided it to Lopez Team loan  
2 officers so they could initiate loans. When Lopez Team members  
3 accessed the database from California, they transmitted interstate  
4 wire communications.

5 COUNT 1

6 [TITLE 18 U.S.C. § 1343 - WIRE FRAUD]

7 [TITLE 18 U.S.C. § 2 - AIDING AND ABETTING]

8 6. Beginning in or about August 2004, and continuing to on or  
9 about June 9, 2005, in the Southern District of California, and  
10 elsewhere, Defendant Ravinderjit Singh Sekhon did knowingly devise  
11 and intend to devise, with the intent to defraud, a material scheme  
12 and artifice to defraud and to obtain money and property by means of  
13 materially false and fraudulent pretenses, representations, and  
14 promises and the intentional concealment and omission of material  
15 facts.

16 Manners and Means

17 7. It was part of the scheme to defraud that Defendant Sekhon  
18 and other Lopez Team members:

19 a. attended events, including swap meets, and advertized  
20 in Spanish language newspapers and publications and on Spanish  
21 language radio stations to induce low income individuals from  
22 Hispanic communities to utilize the Lopez Team's fraudulent real  
23 estate and loan broker services.

24 b. induced financially unqualified clients to disclose  
25 personal and financial information knowing that the Lopez Team would  
26 later alter the information on loan applications and other documents  
27 to meet the lenders' loan requirements.  
28

1 c. entered personal and financial data provided by the  
2 clients into the Lopez Team database knowing that the Lopez Team  
3 would later fraudulently alter the information on loan applications  
4 and other documents to meet lenders' loan requirements.

5 d. submitted to lenders loan applications that contained  
6 inflated incomes for clients and documents that falsely verified the  
7 inflated incomes.

8 e. submitted to lenders loan applications that contained  
9 false employment information which the Lopez Team and others falsely  
10 verified in writing and by impersonating employers.

11 f. purchased from tax preparers, and submitted to  
12 lenders, letters that misrepresented that the clients were business  
13 owners and that the tax preparers had prepared the clients' tax  
14 returns (CPA letters).

15 g. submitted to lenders loan applications that contained  
16 inflated bank account balances which the Lopez Team falsely verified  
17 with fictitious verifications of deposits.

18 h. caused banks to generate false verifications of  
19 deposits by depositing Lopez Team members' own personal funds into  
20 client bank accounts.

21 i. altered and submitted to lenders bank statements that  
22 were not for the clients' bank accounts, including bank statements  
23 belonging to Defendant Sekhon, Defendant Sekhon's wife, and  
24 Velasquez.

25 j. submitted to lenders loan applications and other  
26 documents, including false verifications of rent, which contained  
27 inflated rent amounts, false rent payment histories, and false  
28 lengths of residency for clients.



1 k. listed and caused to be listed on documents submitted  
2 to, or accessed by lenders, the contact information for Lopez Team  
3 members and others, including Defendant Sekhon, Defendant Sekhon's  
4 wife, and Velasquez, as the clients' landlords to falsely verify  
5 fictitious rental information.

6 l. used third parties with higher credit scores as straw  
7 buyers to purchase homes and obtain loans for financially unqualified  
8 clients knowing that the third parties would not occupy the homes and  
9 that the loan applications would misrepresent that the homes would  
10 be "owner-occupied."

11 m. prepared and submitted to lenders fictitious letters  
12 (purportedly from creditors), and caused credit agencies to make  
13 false entries to clients' credit reports, which falsely bolstered the  
14 clients' credit and falsely listed the telephone numbers of Lopez  
15 Team members and others, including Defendant Sekhon, Defendant  
16 Sekhon's wife, and Velasquez, as contacts for the creditors.

17 n. submitted to lenders loan applications that falsely  
18 represented that clients were United States citizens.

19 o. submitted to lenders copies of false social security  
20 cards which the Lopez Team altered to eliminate the work restriction  
21 language.

22 EXECUTION OF THE SCHEME TO DEFRAUD

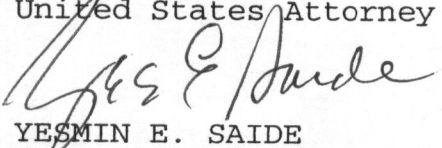
23 8. On or about August 24, 2004, within the Southern District  
24 of California and elsewhere, Defendant Ravinderjit Singh Sekhon, for  
25 the purpose of executing and attempting to execute the aforementioned  
26 material scheme to defraud and to obtain money and property by  
27 materially false and fraudulent pretenses, representations and  
28 promises and the intentional concealment and omission of material

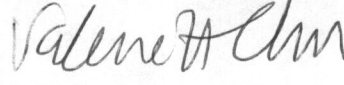
1 facts, with intent to defraud, did knowingly cause to be transmitted  
2 by wire communication in interstate commerce, writings, signs,  
3 signals and sounds, that is, an entry he made in the Lopez Team  
4 database relating to a loan, that was transmitted by wire from San  
5 Diego, California to Florida;

6 All in violation of Title 18, United States Code, Sections 1343  
7 and 2.

8 DATED: 11/6/07

9  
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United States Attorney

11   
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Assistant United States Attorney

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